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August 29, 2024

**BY ECF:**

Honorable Allyne R. Ross  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: United States v. Zhibin Lai  
Case No.: 23-cr-00246- 1 (ARR)  
Letter Motion Seeking Temporary Modification of Release  
Conditions

Dear Judge Ross:

Please be advised that I represent **Zhibin Lai** in the above captioned action.

Mr. Lai is currently subject to release conditions as per Your Honor's June 27, 2023 (ECF No.: 8) Order, Mr. Lai cannot leave New York State and New Jersey except for travel to and from court.

We respectfully submit this letter requesting a temporary modification of Mr. Lai's release conditions.

Mr. Lai seeks permission from the court to travel outside of New York State and New Jersey to go on vacation with his family to Camelback Resort in Tannersville, Pennsylvania from September 2, 2024 to September 4, 2024.

All other restrictions on Mr. Lai will remain in place throughout the duration of this trip.

Neither Pretrial Services nor the Government has any objection to the requested modification.

Thank you in advance for your attention to this matter.

Honorable Allyne R. Ross  
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Sincerely,  
**Spodek Law Group P.C.**  
/s/ Todd A. Spodek  
Todd A. Spodek

cc: All Counsel of Record (By ECF).  
PSO Robert Stehle (By Email).